

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

GETTY IMAGES, INC., a Delaware
Corporation,

Plaintiff,

vs.

ROXANNE MOTAMEDI, an individual,

Defendant.

Case No. 2:16-cv-1892

DECLARATION OF ANNE HATCHER
IN SUPPORT OF PLAINTIFF'S
MOTION FOR TEMPORARY
RESTRAINING ORDER

1. I am over 18 years of age, am competent to testify, and have personal knowledge of the facts set forth herein.

2. I am the Vice President, Human Resources of a wholly owned subsidiary of Plaintiff Getty Images, Inc. ("GETTY IMAGES").

3. I have worked for GETTY IMAGES for more than 15 years and, in my role, am responsible for the management of all human resources records and policies in North America for all of Plaintiff's subsidiaries.

4. GETTY IMAGES has procedures in place to protect the confidentiality of its proprietary and trade secret information. For example, all employees must sign a Non-Disclosure Agreement as a condition of being allowed access to GETTY IMAGES's trade secrets and confidential information. This agreement clearly states the company's expectations that employees will not disclose confidential information to third parties and will not use such information for any purpose except to further GETTY IMAGES' business. Thereafter,
DECLARATION OF ANNE HATCHER - 1

1 employees are required to annually review and acknowledge in writing their commitment to
2 follow the policies set forth in GETTY IMAGES's Resource Guide, including GETTY
3 IMAGES's Code of Business Conduct. Employees are also subject to GETTY IMAGES's Code
4 of Ethics. In addition to the foregoing policies, we regularly remind employees, whenever the
5 opportunity to do so presents itself, of the ongoing requirement to preserve and protect GETTY
6 IMAGES's trade secrets and confidential information. We do so because our trade secrets and
7 confidential information are critical to maintaining market share and competitiveness. When
8 employees leave the company, we have them sign a Separation Statement acknowledging their
9 compliance with regard to company property, information, confidentiality, and invention
10 agreements.

11 5. I have reviewed the personnel file of Defendant Roxanne Motamedi. Attached
12 hereto as Exhibit 1 is a true and correct copy of her signed Non-Disclosure Agreement.

13 6. Attached hereto as Exhibit 2 is a true and correct copy of Motamedi's signed
14 Resource Guide Acknowledgement form.

15 7. Attached hereto as Exhibit 3 are true and correct copies of GETTY IMAGES's
16 policies that are provided to employees as part of the Resource Guide, including the following
17 policies: Our Standards; Acceptable Use Policy; Code of Business Conduct; and our Code of
18 Ethics. As a Vice President, Ms. Motamedi was expected to fully comply with their
19 requirements and restrictions. Key portions have been highlighted.

20 8. On October 14, 2016, GETTY IMAGES' Director of Human Resources emailed
21 exit paperwork to Motamedi that included a Separation Statement for Motamedi to sign and
22 return to us. However, Motamedi refused to sign and return the Separation Statement. Attached
23 hereto as Exhibit 4 are true and correct copies of the October 14, 2016 email and Separation
24 Statement that were sent to Motamedi.

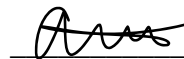
25 9. Motamedi was reminded of the company's policy regarding confidentiality
26 several times during her employment, as well as shortly before her employment ended. Attached
27 hereto as Exhibit 5 is a true and correct copy of two recent emails sent by Dawn Airey, GETTY
28 IMAGES's CEO, dated May 18 and August 16, 2016 to Roxanne and the Senior Leadership
DECLARATION OF ANNE HATCHER - 2

1 Team (all Senior Directors, Vice Presidents and Senior Vice Presidents), sharing information
2 regarding the business and reminding them of the company's expectations regarding
3 confidentiality. Attached hereto as Exhibit 6 is a true and correct copy of an email exchange
4 between GETTY IMAGES's Compensation and Benefits Manager and Motamedi, dated October
5 20, 2016, in which Motamedi was again reminded of her confidentiality obligations.

6 10. I have also reviewed the personnel file for Nick Evans-Lombe, GETTY
7 IMAGES's former Chief Operating Officer. Mr. Evans-Lombe was employed by GETTY
8 IMAGES from February 5, 1996, until April 8, 2013. During his employment with GETTY
9 IMAGES, and for a period of twelve months following the end of his employment, Evans-
10 Lombe was subject to a non-compete agreement.

11 I declare under the penalty of perjury under the laws of the United States that the
12 foregoing is true and correct.

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14 DATED this 11 day of December, 2016, at Renton, Washington.

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17 Anne Hatcher
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